

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

LEE JORDAN,)	CASE NO: 1:17cv2407
)	
Plaintiff,)	JUDGE DAN AARON POLSTER
)	
v.)	MAGISTRATE JUDGE
)	THOMAS M. PARKER
SAFE CHOICE, LLC, et al.,)	
)	
Defendants.)	
)	

**MOTION FOR EXTENSION OF DEFENDANTS, SAFE CHOICE, LLC, ANTHONY
SPENCER, AND ANITA SPENCER’S, RESPONSE TO PLAINTIFF’S COMPLAINT
(PROPOSED ORDER THEREON)**

Defendants, Safe Choice, LLC, Anthony Spencer, and Anita Spencer (“Defendants”), by and through its undersigned counsel, hereby moves for a twenty-one (21) day extension of time, up to and including **Monday, January 8, 2018** in which to move, answer, plead or otherwise respond to Plaintiff’s Complaint.

This is Defendants’ first request for an extension of time in connection with this matter. This request is not interposed for purposes of delay but is due to the fact that counsel was just retained today.

Respectfully submitted,

/s/ Mark S. Fusco

Mark S. Fusco (Reg. No. 0040604)

Email: mfusco@walterhav.com

Direct Dial: 216-619-7839

George J. Asimou (Reg. No. 0080060)

Email: gasimou@walterhav.com

WALTER | HAVERFIELD LLP

The Tower at Erieview

1301 E. Ninth Street, Suite 3500

Cleveland, Ohio 44114

Phone: 216-781-1212/Fax: 216-575-0911

*Attorneys for Defendants Safe Choice, LLC,
Anthony Spencer and Anita Spencer*

SO ORDERED:

Dated: _____

**HONORABLE DAN AARON POLSTER
UNITED STATES DISTRICT JUDGE**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing *Motion for Extension of Defendants, Safe Choice, LLC, Anthony Spencer, and Anita Spencer's Response to Plaintiff's Complaint* has been electronically filed this 18th day of December, 2017. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Mark S. Fusco

Attorney for Defendants